

**United States District Court****SOUTHERN DISTRICT OF TEXAS**Clerk, U.S. District Court  
Southern District of Texas  
FILEDJUL 15 2015  
David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

V.

**DAVID GARCIA****CRIMINAL COMPLAINT**

CASE NUMBER:

**C-75-898M**

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about July 7, 2015 in NUECES county, in the SOUTHERN District of TEXAS, defendant(s) did, (Trace Statutory Language of Offense)

**WITH INTENT TO DEFRAUD, KEEP IN HIS POSSESSION AND CONCEAL FALSELY MADE, FORGED, COUNTERFEITED AND ALTERED OBLIGATIONS OR SECURITIES OF THE UNITED STATES, THAT IS, CURRENCY**

in violation of Title 18, United States Code, Section(s) 472.

I further state that I am a(n) RESIDENT AGENT IN CHARGE and that this complaint is based on the following facts:  
Official Title

**SEE ATTACHED**

Continued on the attached Sheet and made a part hereof:

☒ Yes ☐ No**DANIEL E. MORALES**

Signature of Complainant

Sworn before me and subscribed in my presence,

Date

at **CORPUS CHRISTI, TEXAS**  
City and State**B. JANICE ELLINGTON, U.S. MAGISTRATE JUDGE**

Name and Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Dan Morales., being duly sworn, hereby depose and say

I am the Resident Agent in Charge, assigned to the McAllen Resident Office, United States Secret Service, since December 2014 and a special agent of the United States Secret Service since March 1996.

The information contained in this affidavit is based on my training, experience, and participation in counterfeit U.S. currency investigations, my personal knowledge and observations during the course of this investigation, and information provided to me by other sources noted herein.

On or about July 7, 2015, Corpus Christi Police arrested DAVID GARCIA, after being called to a domestic disturbance at the residence of his girlfriend Shawna Atchley. GARCIA who fled the scene when officers arrived and attempted to discard his wallet. In a search incident to arrest Corpus Christi Officers discovered six (6) suspect \$50 Federal Reserve Notes all bearing S/N: GG27205197A, and a genuine \$50 Federal Reserve Note bearing the same S/N: GG27205197A.

Continuing on or about July 7, 2015, Corpus Christi Police Officers interviewed Shawna Atchley who advised that DAVID GARCIA was printing counterfeit Federal Reserve Notes and that he had given her a counterfeit \$50 Federal Reserve Note which she returned because she wanted the genuine \$50 Federal Reserve Note he was using as a "Pattern Note". Shawna Atchley further advised Corpus Christi Officers that the printer that GARCIA used to manufacture the counterfeit Federal Reserve Notes was located in the bed of the truck he was driving.

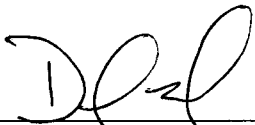
Continuing on or about July 7, 2015, Corpus Christi Police Officers discovered an Epson All in one scanner/copier/printer in the bed of the truck that GARCIA fled from upon their arrival. In addition Corpus Christi Police Officers discovered a counterfeit \$100 Federal Reserve Note bearing S/N: LG4257584C (Front Only) and the back of a \$5 Federal Reserve Note.

On or about July 7, 2015, this writer met with Corpus Christi Police Detective Steve Smith at the Corpus Christi Police Department located at 321 John Sartain, Corpus Christi, Texas. This writer was provided with access to the suspect Federal Reserve Notes which were seized by the Corpus Christi Police Department, which were determined to be counterfeit.

On or about July 7, 2015, Corpus Christi Police Department detective Steve Smith and this writer interviewed DAVID GARCIA at the Nueces County Sheriff's Department located at 901 Leopard Street, Corpus Christi, Texas. Prior to any questioning GARCIA was advised of his Miranda Rights by this writer verbally and in writing, which he acknowledged and waived. GARCIA claimed that he found the printer and counterfeit currency at his girlfriend's residence and decided to steal the items. GARCIA further

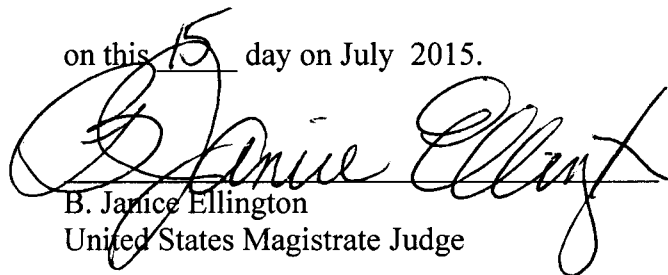
claimed that his fingerprints will be on the printer since he handled it inside the bag when he took the counterfeit Federal Reserve Notes from the bag. GARCIA could not explain how he was able to place the counterfeit money and "pattern note" in his wallet while he was fighting off his girlfriend. GARCIA denied all knowledge of counterfeit currency.

Based on the above information, this affiant believes that DAVID GARCIA on or about July 7, 2015, did, in the Southern District of Texas, knowingly and with intent to defraud, possessed six (6) counterfeit \$50 Federal Reserve Notes bearing serial number GG27205197A and uttered one (1) counterfeit \$50 Federal Reserve Note bearing S/N: GG27205197A, all in violation of 18 USC 472 – Possession/Uttering Counterfeit Obligations or Securities.

  
Daniel E. Morales  
U.S. Secret Service

Subscribed to and sworn before me

on this 15 day on July 2015.

  
B. Janice Ellington  
United States Magistrate Judge